

December 6, 2022

**RE: ACP Proposed Amendments to the Standards of Practice for Pharmacists and Pharmacy Technicians (SPPPT)**

On behalf of the Pharmacy Technician Society of Alberta (PTSA), I would like to provide feedback in relation to the proposed amendments to the Standards of Practice for Pharmacists and Pharmacy Technicians (SPPPT) and Bylaws. The Bylaw amendments appear to directly reflect requirements resulting from Bill 46 amendments to the Health Professions Act. We encourage the Council to consider whether all information requested from an applicant is required, such as gender.

Generally, PTSA supports adding clarifying details to the Standards of Practice to enable pharmacy professionals to interpret them as intended. While the amendments proposed to Standard 20 align with the definitions and requirements found in the Pharmacists and Pharmacy Technicians Profession Regulation we have concerns that, as written, they may cause more confusion as it relates to pharmacy technician practice.

In 2020, our organization published the [Position Paper: Changes to Pharmacy Technician Practice Framework](#). This document outlines several key changes required to reflect current practice models and enable pharmacy technicians to fulfill roles they are qualified for. Several recommendations were made regarding the application of direction compared with supervision. Pharmacists are not responsible for supervising the practice of pharmacy technicians. The concept of direction is intended to facilitate the complimentary practice of pharmacy technicians and pharmacists. While providing direction is still referred to in the details supporting the application of standard 20, we do not support removing “direction” from the overarching standard statement. Additionally, the statement requiring a pharmacist to receive reports from a pharmacy technician requires revision so the intent is clear.

Amending the Standards also offers the opportunity to provide greater clarity surrounding appropriate roles for non-regulated pharmacy employees. We feel strongly that additional amendments are needed to sections 20.12 and 20.13. In June 2016, Council adopted recommendations regarding the use of non-regulated personnel for compounding sterile preparations. “Because of the unique training and technical competencies required to compound sterile preparations and because of the limitations to providing continuous direct supervision...the implementation of the Model Standards restrict sterile compounding activities to regulated pharmacy personnel...”. To the best of our knowledge, this restriction is not clearly included in any component of the practice framework and should be reflected in the Standards of Practice.

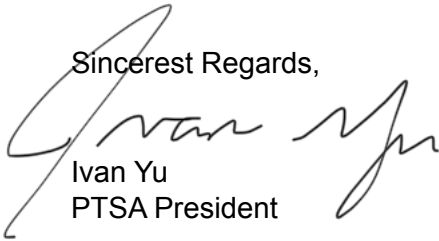
We feel strongly that the performance of other activities should be restricted for pharmacy employees for similar reasons. The [Role Clarification of Non-Regulated Pharmacy Employees](#) publication outlines appropriate tasks for trained and supervised pharmacy employees.

As we understand it, revisions to Standard 20 are not directly required as a result of Bill 46 proclamation; therefore, we strongly encourage Council to delay these specific amendments. I would also like to offer PTSA's assistance with the further work needed to ensure the Standards, and potentially the regulation, are as accurate as possible as it relates to direction and supervision of pharmacy technicians and pharmacy employees.

We thank you in advance for your careful consideration and would be more than happy to provide clarification as required.

Questions about this feedback should be directed to [info@ptsa.ca](mailto:info@ptsa.ca).

Sincerest Regards,

A handwritten signature in black ink, appearing to read 'Ivan Yu', written in a cursive style.

Ivan Yu  
PTSA President