

January 2, 2024

National Association of Pharmacy Regulatory Authorities  
Sent by email: [competencies@napra.ca](mailto:competencies@napra.ca)

**RE: New entry-to-practice competencies for pharmacy professionals in Canada**

On behalf of the Pharmacy Technician Society of Alberta (PTSA), Pharmacy Technician Society of British Columbia (PTSBC) and Canadian Association of Pharmacy Technicians (CAPT), we would like to provide feedback related to the proposed changes to *Professional Competencies for Pharmacists and Pharmacy Technicians at Entry to Practice in Canada* (i.e., ETP competencies). Since the ETP competencies are meant to serve as the basis for the development of national pharmacy licensing examinations, educational outcomes for pharmacy educational programs, as well as assessment tools for pharmacy regulatory authorities, we appreciate the importance of ensuring they reflect the practice of pharmacy professionals in Canada.

Generally, we found the proposed amendments create broad competency statements that reflect current competencies and practices. However, competencies 1.7.2 to 1.7.4 must be further revised so that pharmacy technicians and pharmacists continue to be required to safely compound quality hazardous and non-hazardous, sterile, and non-sterile compounds at entry-to-practice. Please refer to the appended position paper for rationale to support this recommendation.

The compounding competencies with these suggested edits are **critical** for the safe and competent performance of an entry-level pharmacy technician. Since practice settings and professional practices vary greatly, we feel that these, as well as ALL competencies, have the potential to be demonstrated **daily** where applicable.

Additionally, we note the potential for clarifying several other competency areas:

- The term “physical attributes” used in competency 1.1.5 could be subjective and limit the practice application compared to the statement in the current version of the ETP competencies.
- The pharmacy technicians’ role in collaborating to develop plans for patients’ care is missing from the updated ETP competencies. At minimum, pharmacy technicians are able, and expected, to communicate relevant information and identify concerns to the pharmacist. This is noted in current competency 2.3.4.
- The updated statement 1.4.4 may cause confusion about pharmacy technicians’ ability to act as the health professional recommending medical devices. The same verbiage should be used in the pharmacy technician competencies as is outlined for pharmacists.

- Where statements refer to pharmacy technicians providing advice to patients (i.e., 3.2.3), adding a qualifying term such as “non-therapeutic” could better reflect practice expectations.
- Pharmacy technicians may make referrals to other healthcare professionals through various means. The word “formal” should be removed from 3.3.4 and 3.3.5.

You will find that these recommendations are mirrored in individual survey responses from members of our respective organizations. We ask that further updates to the ETP competencies are made as outlined in this letter to accurately reflect pharmacy technician practice.

Please do not hesitate to contact us if you have questions.

Warmest Regards,

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