

REGULATION OF PHARMACY TECHNICIANS - BUSINESS CASE ANALYSIS

FOR THE COUNCIL OF THE COLLEGE OF PHARMACISTS OF
BRITISH COLUMBIA

PREPARED BY THE STEERING COMMITTEE

NOVEMBER 2006



COLLEGE *of* PHARMACISTS
OF BRITISH COLUMBIA

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REGULATION OF PHARMACY TECHNICIANS – BUSINESS CASE ANALYSIS

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EXECUTIVE SUMMARY

The evolution of pharmacy practice is driven by changing patient demographics and advances in medical care that draw on a pharmacist's drug expertise. Pharmacists, who face greater demands on their time and medication knowledge, are more and more dependent on pharmacy technicians to meet increasing prescription volumes and growing administrative needs. As pharmacy technicians grow in number and importance the need for standardized training and regulation has become apparent. Regulation of pharmacy technicians further enables pharmacists to dedicate more time to provide a higher level of therapeutic consultation and a safer delivery of drugs to their patients and service to the public.

The College of Pharmacists of BC Strategic Plan, 2006, Strategic Direction #2, Support Goal #1 recommended that a model for pharmacy technician regulation be developed.

All individuals practising or assisting in the practice of pharmacy should be accountable to the public through the College of Pharmacists of BC. The regulation of pharmacy technicians will authorize pharmacy technicians to independently perform elements of pharmacy practice and be accountable for their work. A pharmacist would continue to have responsibility for overall supervision of the pharmacy premises and to perform his/her patient centered role in preventing, identifying and solving drug related problems.

This document defines the business and functional requirements to regulate pharmacy technicians through the College of Pharmacists of BC. It outlines a high level implementation plan to integrate the practice of pharmacy technicians and pharmacists under one governance structure. It outlines the timelines and financial costs to regulate pharmacy technicians. The timeframe may be constrained by the federal and provincial regulatory process, the CCAPP process for pharmacy technician program accreditation, and the PEBC development of a national examination process. Further progress may be prevented by legal and regulatory barriers.

The projected start up cost for Phase I, II, and III for fiscal years 2007-2009 is \$234,700.00. The projected income statement for fiscal years 2010-2014, is as follows:

2010	(-) \$276,000.00
2011	(-) \$121,950.00
2012	(+) \$2,308.00
2013	(+) \$213,964.00
2014	(+) \$458,734.00

The practice of pharmacy must ensure the best use of medications for patients and in order for this to happen pharmacists' priorities must shift from the traditional product-focused dispensing role to that of a patient-focused service provider in medication management. The regulation of pharmacy technicians would allow pharmacy technicians to independently perform a limited number of dispensing activities that are currently included solely within the scope of practice for pharmacists.

1. PURPOSE

College of Pharmacists of BC Strategic Plan, 2006 – Strategic Direction #2

“Implement strategies to optimize use of knowledge, skills and abilities of pharmacists and pharmacy technicians.

Statement of Rationale

The optimal use of regulated pharmacy technicians will alleviate pressures on existing pharmacists and support the enhanced role of the pharmacist.

Support Goal #1

Develop a model for pharmacy technician regulation.

Support Goal #2

Identify patient needs to achieve better health outcomes.

The demand for pharmacy services in British Columbia will increase in the coming decades because of the aging population. The majority of Canadians over 65 years of age have at least one chronic disease, many of which are managed by prescription drug therapy or by drugs restricted to sale from pharmacies. This increased demand for pharmacy services together with pressures within the profession to enhance the public health role of pharmacists, and an inadequate graduate class size in the pharmacy school at the University of British Columbia has the potential to further increase the current shortage of pharmacists resulting in a reduction in access to pharmacy services. In addition, impending retirements and increased numbers of pharmacists working part-time could worsen the pharmacist shortage.

Pharmacy technicians are well poised to take on a number of technical responsibilities in the dispensing process. The expanded use of the pharmacy technicians in both community and hospital environments is a potential facilitator in advancing the role of the pharmacist. New roles for pharmacy technicians continue to emerge as a result of changing patient demographics, increased use of prescription drugs, practice innovation, and new technologies.

This paper position is that all individuals practicing or assisting in the practice of pharmacy should be accountable to the public through the College of Pharmacists of BC. All regulated pharmacy technicians should require standardized education, training and certification to effectively accomplish their work. They should be held accountable and responsible for their actions.

This document will examine the current model of practice, the proposed model of practice and the financial costs required to regulate pharmacy technicians through the College of Pharmacists of BC.

2. BACKGROUND

The *White Paper on Pharmacy Technicians – a Discussion for Council March 2006* provided five options for the regulation of pharmacy technicians:

- Pharmacy technicians should not be a regulated health professional
- Pharmacy technicians should be registered by the College of Pharmacists of BC
- Self-regulation by pharmacy technicians
- Voluntary regulation by the College of Pharmacists of BC
- Regulation by the College of Pharmacists of BC

Of these five options the Council of the College of Pharmacists of BC determined that regulation by the College of Pharmacists of BC was the preferred options and is the basis for this business case analysis.

3. OBJECTIVES

This document will:

- Outline a high level implementation plan to integrate the practice of pharmacy technicians and pharmacists under one governance structure
- Identify the financial implications to the College of Pharmacists of BC

4. SCOPE

The business case analysis will include:

- The cost to develop a framework of practice for pharmacy technicians
- The cost of implementing Phase I, Phase II, Phase III and Phase IV as described in *Detailed Requirements and Timelines* (section 11) and *Financial Summary* (section 12) of this document

The business case analysis will not include:

- A detailed implementation plan for Phase IV
- Market value/salary expectations for pharmacy technicians
- Market value/payment model to pharmacists for their increased clinical role

5. ASSUMPTIONS

- Additional physical space at the College of Pharmacists of BC office is not required.
- Independent funding for “start-up” costs to be obtained.
- The cost of initial registration and on-going costs to be self-sustaining.
- No impact on pharmacist registration fees.
- A grand-parenting clause will be created to allow all existing pharmacy technicians to write the entry-to-practice exam within a three year period of the commencement of the registration process.
- Stakeholders will agree to adapt the Ontario College of Pharmacists Standards of Practice and Competency Profile; or modify the College of Pharmacists of BC Framework of Professional Practice to include the scope of practice for pharmacy technicians.
- There is a national movement towards the regulation of pharmacy technicians and a mutual recognition agreement. NAPRA will develop a scope of practice statement for pharmacy technicians and will define practice competencies for pharmacy technicians during 2007.
- The new national educational outcomes by the Canadian Pharmacy Technician Educators Association (CPTEA) will serve as the foundation for the accreditation standards. The educational outcomes will also serve as an important foundation for the development of the national entry-to-practice/certification exam with the intent to have the first exam in place for the fall of 2009.
- The Canadian Council for Accreditation of Pharmacy Programs (CCAPP) will accredit pharmacy technician educational training programs
- The Pharmacy Examining Board of Canada (PEBC) will prepare and administer a national examination to test the entry to practice competencies of pharmacy technicians.
- The use of existing College of Pharmacists of BC resources for registration, complaint/discipline; and expansion of committees to include pharmacy technicians.

6. CONSTRAINTS

- Timeframe may be constrained by:
 - a) The federal and provincial regulation process.
 - b) CCAPP process for pharmacy technician program accreditation.
 - c) PEBC development of a national examination process.
- Legal and regulatory barriers may prevent progress.

7. THE NEED FOR REGULATION OF PHARMACY TECHNICIANS

Pharmacists must relinquish routine product-handling functions to pharmacy technicians in order to improve patient outcomes by following the patient-focused model of care and become engaged in medication management in an interdisciplinary health care environment. Pharmacists will be accountable for the individual patient outcomes of medication therapy they manage, the reconciliation of all medication regimens, and the information provided for optimal medication use. The delegation of technical tasks to pharmacy technicians requires the regulation of pharmacy technicians. In the future there will be little need for traditional dispensing pharmacists when pharmacy technicians and dispensing technology can meet these needs

In February 2006, the Health Council of Canada released its Annual Report to Canadians 2005. The section on Health Human Resources identified the fact that there is a shortage of health services as a result of professionals spending time on activities that could be delegated to others. Their solution was to *reorganize the work to get the best use of the skills in our existing workforce*. The report goes on to state what needs to be done:

- a. *Remove barriers to optimizing skill sets. Governments, health professions, employers, unions, educators and planners must work together to identify, specify legislative, regulatory, financial and policy impediments to optimally using the knowledge and skills of all health professionals. The focus must be to support, rather than prevent, inter-professional collaboration and teamwork.*

The Canadian Pharmacists Association (CPhA) has launched *Moving Forward: Pharmacy Human Resources for the Future* (formerly known as the Pharmacy Human Resources Study). The study will evaluate the feasibility of certification of pharmacy technicians.

The CPhA a *Blueprint for Action for the Pharmacy Profession* will look at role change and pharmacy practice models. Many of the recommendations are targeted specifically towards pharmacy technicians.

The Council of Pharmacy Registrars of Canada met in October 2006, of which one day of the meeting was devoted to examining the role of pharmacy technicians in pharmacy practice.

Many pharmacists would agree that a well-trained pharmacy technician is essential to an efficient pharmacy that provides a high standard of care. Within the profession, however, there may be some resistance to allow pharmacy technicians to participate fully in the dispensing process. This may be due to the fact that some pharmacists are unaware of what the pharmacy technician may be capable of doing or may lack the confidence in the quality of the educational training received by pharmacy technicians. By registering, regulating and establishing the pharmacy technician roles and responsibilities in provincial pharmacy legislation, the pharmacist can be sure the technician knows what to do, and what not to do.

8. CURRENT PRACTICE SUMMARY

The College of Pharmacists of BC *Framework of Professional Practice* is a blueprint of good pharmacy practice. It describes what British Columbia pharmacists do in their daily work. It supports the College's mission to ensure safe and effective pharmacy care to help people of British Columbia achieve better health.

The College of Pharmacists of BC *Bylaws* indicates the level of responsibility of pharmacy support personnel in both community and hospital practice. When pharmacy support persons are performing delegated functions, a pharmacist must be readily available to answer questions and provide direction and supervision.

The College of Pharmacists of BC *Professional Practice Policies* has standards for pharmacy technician verification of non-sterile and sterile products in hospital pharmacy practice.

The pharmacy manager is responsible for the provision of pharmacy services. A pharmacy support person is not permitted to direct, influence, control or participate in the professional functions of the pharmacy.

9. PROPOSED PRACTICE SUMMARY

The regulation of pharmacy technicians will authorize pharmacy technicians to independently perform elements of pharmacy practice; dispensing and compounding. Additional roles may be included in hospitals with regards to clinical activities within the pharmacy. Pharmacy technicians will be required to refer all inquires and/or issues that require therapeutic decision to the pharmacist.

Pharmacy technicians will be accountable for their aspects in the process for the delivery of pharmacy services.

Regulation of pharmacy technicians further enables pharmacists to dedicate more time in order to provide a higher level of therapeutic consultation and a safer delivery of drugs to their patients and service to the public.

10. GUIDING PRINCIPLES FOR THE BUSINESS CASE ANALYSIS

- What is needed, not how it will be implemented
- Consultative Process: Regional meetings will be held to present details of the proposal to regulate pharmacy technicians
- In changing the practice of pharmacy, communication strategies need to be extensive and on-going
- A clear picture of the future of pharmacy practice must be developed. A guiding principle is the expectation that pharmacists will be engaged in a patient-centered role (Pharmaceutical Care, Framework of Professional Practice – Role 1)
- The proposal to regulate pharmacy technicians would not change the fact that the pharmacist would continue to have responsibility for the overall supervision of the pharmacy premises and to perform his/her patient-centered role in preventing, identifying and solving drug related problems
- A clear definition of a regulated pharmacy technician will need to be developed to distinguish the role from that of an unregulated pharmacy assistant
- There will be the opportunity for existing pharmacy technicians to become registered by meeting the entry-to-practice requirements. Details of the grand-parenting provision to be determined
- There will be a transition period to fully implement expanded role of the pharmacy technician
- Pharmacists will be able to choose to hire regulated pharmacy technicians to provide this enhanced scope of practice or they may choose not to employ this category of pharmacy technician for their practice site
- College of Pharmacists of BC will support and provide, in conjunction with local schools, opportunities for pharmacy technicians to upgrade their skills and knowledge to meet required standards

11. DETAILED REQUIREMENTS AND TIMELINES

Phase I: September 2006 – November 2006

- Development of Business Case Analysis
- Presentation of Business Case Analysis to the council College of Pharmacists of BC for approval to proceed with regulation of pharmacy technicians

Phase II: December 2006 – December 2007

- Develop and circulate a survey to determine the number of pharmacy technicians working in pharmacies in BC
- Implement a plan for transition to a regulatory model of practice for pharmacy technicians
- Pursue sources of funding
- Review the Ontario College of Pharmacists Proposed Standards of Practice, Competency Profile, Skill Set, Scope of Practice and Code of Ethics for possible adaptation by the College of Pharmacists of BC or modify the College of Pharmacists of BC Framework of Professional Practice to include scope of practice for pharmacy technicians
- Establish education and training standards for pharmacy technicians by adopting the CCAPP “Accreditation Standards for the Training Program for Pharmacy Technicians” and CPTEA “Educational Outcomes for Pharmacy Technician Programs in Canada”
- Stakeholder consultations on the proposed Standards of Practice, Competency Profile, Skill Set, Scope of Practice and Code of Ethics. Consultations to be held in Vancouver (4), Victoria, Nanaimo, Kamloops, Kelowna, Cranbrook, Prince George. One session to be web cast
- **Submission to the Health Professions Council of BC for recognition of pharmacy technicians as a health professional in BC, to be regulated under the Pharmacy Act as pharmacy technicians and be members of the College of Pharmacists of BC**

Phase III: October 2007–December 2008

- Develop a governance structure and determine the regulatory framework for pharmacy technicians
- Establish a continuing competency program
- Establish entry-to-practice requirements
- **Submission to the Government of British Columbia to secure legislation changes, under the Health Professions Act – Pharmacy, to regulate pharmacy technicians as members of the College of Pharmacists of BC**
- Establish a credentialing system, a registration process and procedure, establish a complaints and discipline procedure, establish a quality assurance program

Phase IV: January 2009–December 2009

- Consider applications and begin the credentialing and registration process

Each requirement to be assigned a unique number in order to be tracked throughout the process using Microsoft Project software.

12. Financial Summary

Phase I	\$2700.00
Phase II	\$153,000.00
Phase III	\$79,000.00

Phase IV Projected Income:

Year 1	(-) \$276,000.00
Year 2	(-) \$121,950.00
Year 3	(+) \$2,308.00
Year 4	(+) \$213,964.00
Year 5	(+) \$458,734.00

Refer to section 16 for detailed summaries of the projected costs for fiscal years 2007–09 and the projected income for fiscal years 2010–14.

13. IMPACTS, RISKS AND RISK MITIGATION

Implications/Risks	Impact/Mitigation
Number of pharmacy technicians to be registered not accurately known. Total numbers may significantly impact timelines and total costs	Currently being surveyed
Adherence to timelines is dependent on government approvals. May significantly impact Phase III completion deadline	Utilize Ontario documents to provide Health Professions Council with most appropriate documentation to meet their requirements
Regulation benefit to public	Access to quality pharmacy services to all citizens of BC
Regulation benefit to pharmacists	Highly trained professionals can focus on enhanced clinical roles and medication safety
Regulation benefit to pharmacy technicians	Enhanced professionalism, career ladder, job satisfaction
Regulation benefit to the health care system.	More appropriate use of health care professions and opportunity to provide better services to a greater portion of the population
Costs to the technician and compensation expectations	Ensure adequate planning and communication of potential costs to techs as early as possible in the process
Role of unregulated pharmacy technician	Ensure adequate communication
Transition period and operation of the pharmacy	
Grand parenting clause	Access to bridging programs
Reluctance of pharmacists to accept practice change	<ul style="list-style-type: none"> - Consultation with pharmacy managers, corporate pharmacy representatives and the BCPhA - Communication strategies
Reluctance of pharmacy technicians to take on an enhanced role and be accountable for their actions	<ul style="list-style-type: none"> - Consultation with pharmacy technicians to engage their support for these changes - Regulation should be promoted as a way to enhance the "professionalization" of the job role - Communication strategies
Reluctance of the government to approve a new category of health professional	Highlight that regulation of pharmacy technicians relates to government goals and strategic direction for access to pharmacy services
Reluctance of the public to consent to the enhanced role of the pharmacy technician	<ul style="list-style-type: none"> - Communication strategies - Consider extent of trust in the regulator to serve the public interest

14. CONCLUSION

There is a documented shortage of pharmacists and much evidence to support the integration of highly trained pharmacy technicians in order to allow pharmacists to take increased responsibility for drug therapy and improve the safety and effectiveness of the delivery of pharmacy services. Regulated pharmacy technicians will be more accountable in the dispensing process, optimizing the role of the pharmacist to provide quality primary health care services and increased therapeutic interventions.

15. GLOSSARY OF TERMS

CAPT-Vancouver – The Canadian Association of Pharmacy Technicians Vancouver

CCAPP – Canadian Council for the Accreditation of Pharmacy Programs

CPhA – Canadian Pharmacists Association

CPTEA – Canadian Pharmacy Technician Educators Association

NAPRA – National Association of Pharmacy Regulatory Authorities

PEBC – Pharmacy Examining Board of Canada

16.1 PHARMACY TECHNICIAN BUSINESS CASE – PROJECTED START UP COSTS

CPBC PHARMACY TECHNICIAN BUSINESS CASE				
PROJECTED START UP COSTS (one-time)				
Fiscal years 2007 to 2009				
		FY 2007	FY 2008	FY 2009
Phase I (Sep 06 - Nov 06)				
1.1	Develop business case analysis	600	-	-
1.2	Present analysis to council for approval	-	-	-
	Phase I total	600	-	-
Phase II (Dec 06 - Dec 07)				
2.1	Develop and circulate survey to pharmacy (re count)	2,100	-	-
2.2	Program Director	-	25,000	-
2.3	Communications -- Hold stakeholder consultations/promotions	-	25,000	-
2.4	Implement plan for transition to regulatory model	-	20,000	-
2.5	Develop framework of practice for pharmacy technicians	-	5,000	-
2.6	Pursue sources of funding	-	6,000	-
	Phase II total	2,100	81,000	-
Phase III (Oct 07 - Dec 08)				
3.1	Establish entry-to-practice requirements	-	17,000	16,000
3.2	Establish a quality assurance process	-	13,000	26,000
3.3	Submit proposal to Ministry (re legislation changes under HPA)	-	10,000	5,000
3.4	Communications	-	10,000	10,000
3.5	Develop credentialing/registration process	-	22,000	22,000
	Phase III total	-	72,000	79,000
	GRAND TOTAL	2,700	153,000	79,000
	TOTAL START-UP COSTS			234,700

16.2 PHARMACY TECHNICIAN BUSINESS CASE – PROJECTED INCOME STATEMENT

CPBC PHARMACY TECHNICIAN BUSINESS CASE PROJECTED INCOME STATEMENT (partial/simplified) Fiscal years 2010 to 2014

Assumptions:

- (1) Statement partial/simplified i.e. may need to include more items
- (2) Projections based on COUNT and FEE SCHEDULE below
- (3) Expenses - overhead allocation based on CPBC's FY 2006 figures.

	FY 2010	FY 2011	FY 2012	FY 2013	FY 2014
	Year 1	Year 2	Year 3	Year 4	Year 5
REVENUE					
Application fee	100,000	120,000	140,000	160,000	180,000
Annual license fee	100,000	226,600	381,924	568,218	787,856
Jurisprudence exam (JE)	125,000	150,000	175,000	200,000	225,000
Total revenue	325,000	496,600	696,924	928,218	1,192,856
EXPENSES					
Staffing					
New staff - Registration AA	65,000	66,950	68,959	71,027	73,158
New staff - Reception/Licensure AA (mailings, extra calls)	65,000	66,950	68,959	71,027	73,158
New staff - QOS (0.5 FTE Year 1-3 and 1.0 FTE Year 4-5)	55,000	56,650	116,699	120,200	123,806
New equipment (computer, software, telephone, etc)	2,000	2,000	2,000	2,000	2,000
Committees					
Registration, QA, I&D	2,000	2,000	2,000	2,000	2,000
Others					
Publications and mailouts (assume paper publications continue)	12,000	24,000	36,000	48,000	60,000
Overhead allocation e.g. mgmt, office rent, admin (10% of \$4 m)	400,000	400,000	400,000	400,000	400,000
Total expenses	601,000	618,550	694,616	714,254	734,122
SURPLUS (SHORTFALL)	-276,000	-121,950	2,308	213,964	458,734

Projections above based on following assumptions:					
COUNT (#)	Year 1	Year 2	Year 3	Year 4	Year 5
New registrants	1,000	1,200	1,400	1,600	1,800
Renewals	0	1,000	2,200	3,600	5,200
Total registrants	1,000	2,200	3,600	5,200	7,000
FEE SCHEDULE (\$)	Year 1	Year 2	Year 3	Year 4	Year 5
Application/processing fee	100	100	100	100	100
Annual license fee	100	103	106	109	113
Jurisprudence exam (JE)	125	125	125	125	125

17. REFERENCE AND READING LIST

College of Pharmacists of British Columbia

- Standards for Pharmacy Technician Verification of Non-Sterile Products in Hospital Practice
- Standards for Pharmacy Technician Verification of Sterile Products in Hospital Practice
- TechWise Hiring Smart
- White Paper on Pharmacy Technicians – Discussion for Council
- Framework of Professional Practice

Canadian Pharmacists Association

- Environmental Scan of Pharmacy Technicians, September 2001
- Blueprint for Action for the Pharmacy Profession
- Moving Forward: Pharmacy Human Resources for the Future

Ontario College of Pharmacists

- Proposed Standards of Practice for Registered Pharmacy Technicians

Canadian Society of Hospital Pharmacists

- Information Paper on the Role of the Pharmacy Technician
- Guidelines for the Delegation of Functions to Pharmacy Technicians and Other Support Personnel

Other

- Health Council of Canada Annual Report to Canadians 2005
- Leading Change in Pharmacy Practice – Ross Tsuyuki, Theresa Schindel