



COUNCIL POLICY

Waiver of Registration or Licensing Requirements in the Public Interest – Applicants from Eligible International Jurisdictions

Introduction

The NSCP (the “College”) recognizes that in certain scenarios and circumstances the public interest is served by waiving specific licensing requirements.

The Government’s provision for regulators to waive licensing requirements under the *Patient Access to Care Act* s.5(4) when it is in the public interest to do so demonstrates their agreement.

5(4) An authority may waive any requirement for registration, licensing or renewal of registration or licensing if the authority determines it is in the public interest to do so.

The risks to safety and quality of care currently being realized by health workforce shortages require regulators to be agile in their approach to providing licenses to healthcare professionals in order to continue to work in the public interest to ensure continued access to quality healthcare.

This is true of the pharmacy workforce in Nova Scotia and prompt action is needed to increase supply through various initiatives, including streamlining licence requirements for international applicants to support recruitment, while also ensuring that the appropriate safeguards are in place (e.g., a transition period that strengthens the safeguard of peer assessment and professional accountability).

This policy waives initial registration and licensing requirements beyond that required of an applicant from another Canadian jurisdiction for those from specified jurisdictions. However, all other legislated provisions and requirements remain and continue to serve as important safeguards of the public interest. This includes the Registrar’s authority to impose conditions on a licence, and the pharmacy manager’s requirement to oversee the pharmacy’s licensees and advise the College of professional practice problems or conduct they observe or otherwise become aware of that could affect the health or safety of patients.

Definitions

“Equivalent authorized scope of practice” means the respective scope of professional activities that a pharmacist or pharmacy technician is authorized to practice in the jurisdiction is equivalent to the minimum scope of practice of a pharmacist or pharmacy technician in a Canadian jurisdiction.

“Transition Direct Patient Care Licence” means a licence to practice direct patient care as a pharmacist or pharmacy technician which is valid for the Transition Period.

“Transition Period” means a minimum of twenty-eight (28) business days and continues until the requirements of section 7.0 are fulfilled or the College revokes the license.

Purpose

To set out the criteria that must be met for the College to deem licenses provided by a jurisdiction as being equivalent to those provided in Canada for a pharmacist or pharmacy technician and to identify the jurisdictions where it is in the public interest that applicants from those jurisdictions be processed similar to applicants from a Canadian jurisdiction.

Policy

- 1.0 The College takes a principles-based approach to ensuring that waiver of registration or licensing requirements is in the public interest, only waiving requirements for jurisdictions that meet or exceed the criteria set out in this policy.
- 2.0 The College will waive requirements for registration, licensing or the renewal of registration or licensing that are beyond that required of an applicant from another Canadian jurisdiction when they are licensed by a regulatory body in a jurisdiction set out in Schedule A.
- 3.0 A jurisdiction is eligible to be included in Schedule A if the College determines in accordance with Schedule B that the jurisdiction has:
 - 3.1. Equivalent training requirements for pharmacists and/or pharmacy technicians, including that licensees must:
 - 3.1.1. Complete at minimum a baccalaureate pharmacy program that is accredited by a national pharmacy program accreditation body to be licensed as a pharmacist; or
 - 3.1.2. Complete at minimum a diploma pharmacy technician program that is accredited by a national pharmacy program accreditation body to be licensed as a pharmacy technician or a training program that is substantially equivalent.
 - 3.2. Equivalent entry-to-practice licensure requirements for pharmacists and/or pharmacy technicians, including that licensees must:
 - 3.2.1. Complete structured and unstructured practice experience prior to licensure; and
 - 3.2.2. Successfully complete a national standardized competency assessment or an assessment that is substantially equivalent.
 - 3.3. Equivalent authorized scope of practice and the common practice of a pharmacist or pharmacy technician in a Canadian jurisdiction; and
 - 3.4. Equivalent regulatory oversight of the registration and licensing and practice of pharmacists and/or pharmacy technicians, including that the regulatory body in the jurisdiction:
 - 3.4.1. Licenses pharmacists and/or pharmacy technicians;
 - 3.4.2. Investigates professional misconduct complaints;
 - 3.4.3. Inspects pharmacy practice;
 - 3.4.4. Requires adherence to professional standards/standards of care and a code of ethics; and
 - 3.4.5. Requires routine renewal of licensure, including a process to ensure continuing competence.

- 4.0 An individual is eligible as a licensee of a jurisdiction in Schedule A if they certify to the Registrar that they have practised sufficient direct patient care pharmacy in the preceding two (2) years in that jurisdiction or in Canada to maintain the competence to practise direct patient care pharmacy, and:
- 4.1 They are confirmed by the jurisdiction to be licensed, with no conditions or restrictions, as a pharmacist or pharmacy technician in the jurisdiction; or
 - 4.2 They have previously been licensed as a pharmacist or pharmacy technician in the jurisdiction and practised in the jurisdiction and they are
 - 4.2.1 confirmed by that jurisdiction to be eligible to resume their licence as a pharmacist or pharmacy technician without conditions or restrictions, with the only remaining requirement being payment of fees; or
 - 4.2.2 currently registered as a pharmacy intern or pharmacy technician candidate/ technician student in a Canadian jurisdiction.
- 5.0 An individual who is eligible for licensure under this Policy shall first receive a Transition Direct Patient Care Licence for the duration of the Transition Period.
- 6.0 A Transition Direct Patient Care Licence is subject to the *Pharmacy Act* and regulations the same as a non-transition direct patient care licence, including the obligation to renew in accordance with the schedule and fees established by the College.
- 7.0 A Transition Direct Patient Care Licence will convert to a full direct patient care licence after the Transition Period if the College is provided with a report, using the form required by the Registrar, by one of the following which declares that the licensee's practice and/or conduct has not raised concern regarding their capacity to safely and ethically engage in pharmacy practice:
- 7.1. The community pharmacy manager or hospital pharmacy manager of the pharmacy practice setting where the licensee is practicing,
 - 7.2. A direct patient care pharmacist or pharmacy technician who has practiced in the physical presence of the licensee for a minimum of 37.5 hours; or
 - 7.3. An auditor appointed by the College to carry out an audit in accordance with s. 8.0.
- 8.0 The College will promptly audit the practice of a licensee in the following circumstances:
- 8.1. The College has received a report that raises concern about the capacity of the licensee to safely and ethically engage in pharmacy practice.
 - 8.2. The College has not received a report under 7.0 within 60 days of the licensee engaging in practice under their Transition Direct Patient Care Licence.
 - 8.3. The licensee has advised the College that they do not have a pharmacy manager or direct patient care pharmacist or pharmacy technician to provide a report under 7.0.

Approved: October 11, 2023
Amended: April 10, 2024

SCHEDULE A

Approved Jurisdictions

Pharmacists

- Australia
- Great Britain
- Ireland
- New Zealand
- United States of America

Pharmacy Technicians

- Great Britain

SCHEDULE B

Assessment Criteria for International Jurisdiction Equivalency

This Schedule sets out the criteria that must be met by an international jurisdiction, as confirmed by that jurisdiction, in order to be included in Schedule A.

Pharmacists

Criterion	Indicators
Required training for pharmacists is substantially equivalent to Nova Scotia training requirements.	<ul style="list-style-type: none"> Complete at minimum a baccalaureate pharmacy program that is accredited by a national pharmacy program accreditation body to be licensed as a pharmacist
Entry-to-practice licensure process is substantially equivalent to Nova Scotia process.	<ul style="list-style-type: none"> Complete structured and unstructured practice experience prior to licensure. Successfully complete a national standardized competency assessment or an assessment that is substantially equivalent.
The role pharmacists are able to serve is substantially equivalent to the role they serve in Nova Scotia.	<ul style="list-style-type: none"> Authorized scope of practice and the common practice of a pharmacist is substantially equivalent to that in Nova Scotia.
The regulatory oversight of the registration, licensing and practice of pharmacists is substantially equivalent to the oversight in Nova Scotia.	<p>The regulator</p> <ul style="list-style-type: none"> Licenses pharmacists Investigates professional misconduct complaints Inspects pharmacy practice Requires adherence to professional standards/standards of care and a code of ethics Requires annual renewal of licensure, including a process to ensure continuing competence

Pharmacy Technicians

Criterion	Indicators
Required training for pharmacy technicians is substantially equivalent to Nova Scotia training requirements.	<ul style="list-style-type: none"> • Complete at minimum a diploma pharmacy technician program that is accredited by a national pharmacy program accreditation body; or • Complete a training or diploma program that is substantially equivalent.
Entry-to-practice licensure process is substantially equivalent to Nova Scotia process.	<ul style="list-style-type: none"> • Complete structured and unstructured practice experience prior to licensure. • Successfully complete a national standardized competency assessment or an assessment that is substantially equivalent.
The role pharmacy technicians are able to serve is substantially equivalent to the role they serve in Nova Scotia.	<ul style="list-style-type: none"> • Authorized scope of practice and the common practice of a pharmacist is substantially equivalent to that in Nova Scotia.
The regulatory oversight of the registration, licensing and practice of pharmacy technicians is substantially equivalent to the oversight in Nova Scotia.	<p>The regulator</p> <ul style="list-style-type: none"> • Licenses pharmacy technicians • Investigates professional misconduct complaints • Inspects pharmacy practice • Requires adherence to professional standards/standards of care and a code of ethics • Requires annual renewal of licensure, including a process to ensure continuing competence